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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 4:23-cr-00267 JSW
)	
Plaintiff,)	JOINT STATUS STATEMENT
)	
v.)	
)	
TIMOTHY ALLEN MANLY WILLIAMS,)	
)	
Defendant.)	

This matter is set for a status conference on September 26, 2023, and the Court has ordered the parties to submit a status report by September 19, 2023. Dkt. 27. The parties hereby respectfully submit this status report.

On August 16, 2023, a federal grand jury returned an indictment charging the Defendant with violations of 18 U.S.C. § 1512(c)(2), obstruction of official proceedings, 18 U.S.C. § 1519, destruction, alteration, and falsification of records in federal investigations, and 18 U.S.C. § 242, deprivation of rights under color of law. The Defendant is represented in these proceedings by the undersigned counsel.

On September 7, 2023, the Court entered a Protective Order. Dkt. 25. On September 15, 2023, the United States produced a first tranche of discovery. This first tranche of discovery includes approximately 3,995 pages. More discovery remains to be produced, and the government will continue to do so on a rolling basis. Because defense counsel has only recently received the first tranche of discovery, she will need time to organize, review, and investigate that discovery before requesting a motions or trial date.

Given the early stage of the case and the government's ongoing efforts to produce complete discovery, at the status conference, the parties will stipulate and agree to set a new status hearing in this case on October 17, 2023, at 1:00 PM or at another date and time convenient to the Court and the parties. The parties stipulate and agree that the time periods between September 26, 2023, and the proposed new status date should be excluded under the Speedy Trial Act calculations. The parties also stipulate and agree that failure to grant the requested continuance would unreasonably deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The parties are hopeful that they will be able to provide the Court with a sense of the timing of the case and any potential resolution or trial at that time.

DATED: 9/18/23

Respectfully submitted,

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/s/
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